1 Martha Boersch (State Bar No. 126569) martha@boerschlaw.com 2 MARTHA BOERSCH, ATTORNEY AT LAW 235 Montgomery Street, Suite 1070 San Francisco, CA 94104 3 Telephone: (415) 562-8587 4 Attorney for Defendant Meghan Centerwall Basso 5 6 UNITED STATES DISTRICT COURT 7 NORTHERN DISTRICT OF CALIFORNIA 8 UNITED STATES OF AMERICA Case No. 11-CR-0947-WHA 9 v. STIPULATION AND PROPOSED ORDER 10 TO CONTINUE STATUS CONFERENCE AND MEGHAN CENTERWALL BASSO, EXCLUDE TIME UNDER THE SPEEDY 11 TRIAL ACT 12 Defendant. 13 14 The government, through Assistant United States Attorney Wilson Leung, and the 15 defendant, through undersigned counsel Martha Boersch, hereby agree to continue the status 16 conference set for Tuesday, October 22, 2012, to Tuesday, December 11, 2012, at 2 pm, and 17 excluding time under the Speedy Trial Act through December 11, 2012. The parties agree and 18 stipulate, and the Court so finds: 19 1. The parties have been engaged in negotiations to resolve this matter but those 20 negotiations are ongoing. 21 2. The government has produced discovery to the defendant. Counsel for the defendant 22 needs additional time to review that discovery as well as to consider the proposed 23 disposition. 24 3. The defendant is pregnant with her first child; her due date is October 29, 2012. As a 25 result, the defendant has been and will be unable to devote significant time to assisting 26 counsel in the review of the discovery. 27 4. The parties agree that time should be excluded under the Speedy Trial Act in the 28 interests of justice for effective preparation of counsel. **STIPULATION** Case No.: 11-CR-0947 WHA

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| 1 | SO STIPULATED. | |
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| 4 | DATED: October 22, 2012 | /s/ Martha Boersch MARTHA BOERSCH |
| 5 | | Attorney for MEGHAN CENTERWALL |
| 6 | , | BASSO |
| 7 | DATED: October 22, 2012 | /s/ W.S. Wilson Leung |
| 8 | | W. S. WILSON LEUNG Assistant United States Attorney |
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| 10 | IT IS SO ORDERED. | |
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| 12 | DATED: October 23 , 2012 | <u> </u> |
| 13 | | HON. WILLIAM ALSUP United States District Judge |
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